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November 13, 2023

VIA ECF

The Honorable Valerie E. Caproni, U.S.D.J.
U.S. District Court, Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Smith v. Proguard Protection Inc. et al*
Case No.: 1:23-cv-03694-VEC

Dear Honorable Judge Caproni:

This law firm represents Plaintiffs Aaron Smith, Tyishia Dudley, Colman Goncalvez, Samuel Deadwyler (collectively, the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves to request an extension of time to comply with Your Honor’s October 12, 2023 Order [Dckt. No. 20], from November 12, 2023 to, through and including December 13, 2023.

This is the first request of its kind, and is made on consent of counsel for Defendants Robert Hall, Richard Stanley and Proguard Protection Inc. (collectively, the “Defendants”).

The basis of this request is that the parties require additional time to finalize the necessary paperwork to effectuate the dismissal of the instant action. The parties anticipate being in a position to respond to Your Honor’s October 12, 2023 Order [Dckt. No. 20] on or before December 13, 2023.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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